1 2 3 4	GIBSON, DUNN & CRUTCHER LLP LAUREN R. GOLDMAN (pro hac vice) lgoldman@gibsondunn.com DARCY C. HARRIS (pro hac vice) dharris@gibsondunn.com 200 Park Avenue New York, NY 10166	
5	Telephone: (212) 351-4000 Facsimile: (212) 351-4035	
6 7 8 9 110 111 112 113 114	ELIZABETH K. MCCLOSKEY, SBN 268184 emccloskey@gibsondunn.com ABIGAIL A. BARRERA, SBN 301746 abarrera@gibsondunn.com One Embarcadero Center, Suite 2600 San Francisco, CA 94111 Telephone: (415) 393-8200 Facsimile: (415) 393-8306 NATALIE J. HAUSKNECHT (pro hac vice) nhausknecht@gibsondunn.com 1900 Lawrence Street Suite 3000 Denver, CO 80202 Telephone: (303) 298-5783 Facsimile: (303) 313-2800	
15 16	Attorneys for Defendant Meta Platforms, Inc.	
17	UNITED STATES	S DISTRICT COURT
18	NORTHERN DISTR	RICT OF CALIFORNIA
19	SAN JOS	E DIVISION
20 21	IN RE META PIXEL TAX FILING CASES	Case No. 5:22-cv-07557-PCP (VKD) [PROPOSED] ORDER GRANTING
22 23 24 25	This Document Relates To: All Actions	PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL Hon. P. Casey Pitts
26		
27 28		

Having considered the Administrative Motion to File under Seal and the Declaration of Lauren R. Goldman, filed by Meta Platforms, Inc. on September 8, 2025, pursuant to Civil Local Rule 79-5(f), all materials submitted in support thereof, and other records on file, and having found that good cause exists for the sealing of the documents listed below:

IT IS HEREBY ORDERED that parts of the Motion to Certify a Class and its exhibits, which plaintiffs filed on August 4, 2025 at Dkt. No. 218 be **SEALED** as outlined below. Accordingly, the public shall only have access to the version of the documents filed at Dkt No. 218 that contains the following redactions:

Document	Portions of Document to Be Sealed	Designating Party	Reason for Redaction
Notice of Motion and Motion for Class Certification Supporting Memorandum of Points and Authorities (Dkt. No. 218) Notice of Motion and Motion for Class Certification Supporting Memorandum of Points and Authorities	Parts of page 1, lines 7, 9-12. (highlighted in Dkt. No. 223) Parts of page 2, line 21; page 13, lines 21-22, 24, 26-28; page 14, lines 1-3, 10-11 (highlighted in Dkt. No. 223)	Meta	This text should be redacted because it reveals specific, non-public information about strategic issues analyzed by Meta employees and actions that Meta took in connection with those analyses. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems. This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields and their contents, as well as how these systems are organized and how the data is
(Dkt. No. 218)	223)		used. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Notice of Motion and Motion for Class Certification Supporting	Parts of page 5, lines 6, 9-10, 13; page 17, line 25; page 18, lines 1-2.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary finance-related integrity systems that Meta uses to filter potentially sensitive

1	Memorandum of Points and	(highlighted in Dkt. No. 223)		data. If this information were disclosed, it would competitively
2	Authorities	,		harm Meta and allow bad actors
3	(Dkt. No. 218)			to undermine the integrity of those systems.
4	Declaration of	Parts of page 3, line 10.	Meta	This text should be redacted
5	Neal Deckant In	(highlighted in Dkt. No.		because it reveals specific, non- public information about Meta's
6	Support of Motion for Class	223-1)		proprietary data storage systems,
	Certification			including the name of a specific
7	(Dkt. No. 218-1)			Hive tables the amount of data in Meta's systems. If this
8				information were disclosed, it
9				would competitively harm Meta and allow bad actors to
10				undermine the integrity of Meta's systems.
11	Exhibit 13 (Dkt.	Parts of page 28, lines 2-	Meta	This text should be redacted
12	No. 218-1)	4; page 49, lines 15-19, 25;		because it reveals specific, non- public information about Meta's
13		page 50, lines 1-2, 9-10, 13- 15, 21-25; page 51, lines 1-		proprietary data storage systems
		8, 10-11, 14-15, 19-21;		(including the names of specific Hive tables and fields, what
14		page 56, line 24; page 66,		information those fields contain,
15		lines 8-13, 16; page 70, lines 5-10; page 91, lines 7,		how the systems can be queried,
16		13, 21-23; page 100, lines		and how the systems are organized); and the proprietary
		13-19, 24; page 101, lines 8, 12-16, 19; page 102,		methods that Meta uses to try to
17		lines 6-10, 24-25; page 103,		match data sent by third-party
18		lines 1, 6-8, 21; page 104,		advertisers to a Facebook account. If this information were
19		lines 4-7, 9-10, 15-17; page 106, lines 5, 20-21, 23-24;		disclosed, it would competitively
20		page 107, line 2; page 108, lines 8-11; page 109, lines		harm Meta and allow bad actors to undermine the integrity of
21		1-11, 20-24; page 110, lines		Meta's systems.
		6-11, 21-25; page 111, lines		
22		1-3, 7-8, 17, 19-22; page 112, lines 1-2, 4-6, 11-12,		
23		16-24; page 113, lines 3-6,		
24		16-23; page 114, lines 1-4,		
25		6-7, 10-12, 14-17, 22-25; page 115, lines 2-9, 12-13,		
		15-16, 19-24; page 116,		
26		lines 6-8; page 117, lines		
27		10, 13-17, 19-25; page 118, lines 1-2, 4-8, 10-14, 17-23;		
28		page 119, lines 5, 9, 11-12,		

1			16-20; page 127, lines 1-5,		
2			9-13, 25; page 128, lines 1- 2; page 129, lines 5, 14, 24;		
3			page 130, lines 1-4, 6-11,		
			13-14, 16-19, 21-22; page		
4			131, lines 3, 5-6, 10, 14, 17-21, 23; page 132, lines 3, 7-		
5			9, 12, 14-17, 19, 22, 24-25;		
6			page 149, lines 23, 25; page 150, lines 1-6, 18-19, 24;		
7			page 151, lines 1-2, 7, 9,		
8			14-15, 19-22, 24-25; page 157, lines 4-7, 10-13; page		
9			172, lines 21-22; page 206,		
			lines 7-12, 19-21.		
10			(highlighted in Dkt. No. 223-1)		
11	F	Exhibit 13 (Dkt.	Parts of page 46, lines 4, 7-	Meta	This text should be redacted
12		No. 218-1)	12, 15-16, 18, 25; page 47,	Wicta	because it reveals specific, non- public information about Meta's
13			line 5; page 73, lines 8-10; page 149, line 20; page 158,		finance-related integrity systems
14			lines 8-17, 21-24; page 159,		used to filter potentially sensitive data. If this information were
15			lines 3-6, 10, 13-23; page 209, lines 23-25.		disclosed, it would competitively
16			(highlighted in Dkt. No.		harm Meta and allow bad actors to undermine the integrity of
			223-1)		Meta's systems.
17	Е	Exhibit 13 (Dkt.	Parts of page 174, lines 23-		This text should be redacted
18		No. 218-1)	25; page 175, lines 10-11.		because it reveals specific, non- public information about Meta's
19			(highlighted in Dkt. No. 223-1)		confidential communications
20			223-1)		between Meta and Taxslayer, as well as steps taken by Meta in
21					connection with those communications. If this
22					information were disclosed, it
23					would competitively harm Meta because it would reflect
					competitively sensitive
24					information about Meta's treatment of data resulting from
25					communications with third
26					parties like Taxslayer. This text should be redacted
27		Exhibit 14	Parts of page 1, "From" lines, "To" line, "BCC"	Meta	because it reveals specific, non-
28		Dkt. No. 218-1			public information about an

1		line, paragraph 1; page 2, paragraph 10.		advertiser's Pixel and account with Meta, as well as employee
2		(highlighted in Dkt. No.		contact information. If this
3		223-1)		information were disclosed, it
4				would competitively harm
4				Meta. Further, if the employee contact information were
5				publicly disclosed, Meta's
6				employees may be inundated
				with harmful or irrelevant emails
7				from outside Meta, which would disrupt Meta's operations, and
8				Meta would face competitive
0				harm
9	Exhibit 15	Parts of page 1, "To" line,	Meta	This text should be redacted
10	(Dkt. No. 218-1	"Subject" line, messages 1,		because it reveals specific, non- public information about Meta's
11	(21111111111111111111111111111111111111	3, 5-6, 9-11, 13, 15; page 2, messages 1-5, 7, 9-12, 15-		finance-related integrity systems,
12		18, 20-21; page 3, messages		confidential business analyses by Meta employees and steps taken
		1-3.		in connection with those
13		(highlighted in Dkt. No.		analyses (including internal, non-
14		223-1)		public communications
1.5				discussing responses to the receipt of potentially sensitive
15				information), and employee
16				contact information. If this
17				information were disclosed, it would competitively harm Meta,
18				permit a glimpse into Meta's
19				internal brainstorming and response plans (which
19				competitors could use), and
20				allow bad actors to undermine
21				the integrity of Meta's
				systems. Further, if the employee contact information
22				were publicly disclosed, Meta's
23				employees may be inundated
24				with harmful or irrelevant emails from outside Meta, which would
				disrupt Meta's operations, and
25				Meta would face competitive
26				harm.
27	Exhibit 16	Sealed in full.	Meta	This exhibit should be sealed in full because it contains
	(Dkt. No. 218-1			discussion of event data
28	•			including specific field names

1				and descriptions of those
2				fields—which is proprietary, commercially sensitive, and
3				confidential. Public disclosure of
3				that information—including the
4				specific way that Meta
5				processes, organizes, and stores event data—would place Meta at
6				a competitive disadvantage and
6				could allow bad actors to
7				undermine the integrity of Meta's systems
8	E-1.11.14.17	C1 - 1 : C-11	Maka	This exhibit should be sealed in
0	Exhibit 17	Sealed in full.	Meta	full because it contains
9	(Dkt. No. 218-1			discussion of event data—
10				including specific field names and descriptions of those
11				fields—which is proprietary,
10				commercially sensitive, and
12				confidential. Public disclosure of that information—including the
13				specific way that Meta
14				processes, organizes, and stores
				event data—would place Meta at
15				a competitive disadvantage and could allow bad actors to
16				undermine the integrity of
17				Meta's systems
	Exhibit 18	Sealed in full.	Meta	This exhibit should be sealed in full because it contains
18	(Dkt. No. 218-1)			discussion of event data—
19				including specific field names
20				and descriptions of those
				fields—which is proprietary, commercially sensitive, and
21				confidential. Public disclosure of
22				that information—including the
23				specific way that Meta processes, organizes, and stores
				event data—would place Meta at
24				a competitive disadvantage and
25				could allow bad actors to undermine the integrity of
26				Meta's systems
	Exhibit 19	Parts of page 10, lines 7-9,	Meta	This text should be redacted
27	(Dkt. No. 218-1)	11-12, 14-15, 24-25; page		because it reveals specific non-
28	(DKt. 110. 210-1)			public information about how Meta's proprietary Core Setup

-6-

1			17, line 12; page 19, lines		setting works. Meta would
2			19-21.		suffer competitive harm if confidential information about
2			(highlighted in Dkt. No.		this setting was publicly
3			223-1)		disclosed. Further, disclosure of
4					this information would give bad
5					actors information that could be used to try to circumvent Meta's
					Core Setup setting.
6		Exhibit 20	Sealed in full.	Meta	This exhibit should be sealed in
7			Scared in fun.	Wicta	full because it reveals specific
8	(D	9kt. No. 218-1)			non-public information about how Meta's proprietary Core
8					Setup setting works. Meta
9					would suffer competitive harm if
10					confidential information about
1.1					this setting was publicly disclosed. Further, disclosure of
11					this information would give bad
12					actors information that could be
13					used to try to circumvent Meta's
		T 1 11	~ 1 11 0 11		Core Setup setting. This text should be redacted
14		Exhibit 22	Sealed in full.	Meta	because it contains discussion of
15	(D	9kt. No. 218-1)			event data—including specific
16					field names and descriptions of those fields—which is
					proprietary, commercially
17					sensitive, and confidential.
18					Public disclosure of that
19					information—including the specific way that Meta
19					processes, organizes, and stores
20					event data—would place Meta at
21					a competitive disadvantage and
22					could allow bad actors to undermine the integrity of Meta's
22					systems
23		Exhibit 23	Parts of page 1, "From"	Meta	This text should be redacted
24		okt. No. 218-1)	line, "To" line, messages		because it reveals specific, non- public information about Meta's
		210 1)	16-18.		employee contact information,
25			(highlighted in Dkt. No.		and links to internal confidential
26			223-1)		webpages, which could be used
27					to improperly gain access to Meta's proprietary documents
					and intranet. If this information
28					were disclosed, it would

-7-

1				competitively harm Meta and
2				allow bad actors to undermine
-				the integrity of Meta's
3				systems. Further, if the employee contact information
4				were publicly disclosed, Meta's
				employees may be inundated
5				with harmful or irrelevant emails
6				from outside Meta, which would
U				disrupt Meta's operations, and
7				Meta would face competitive
8	T 111 : 04	D		harm. This text should be redacted
	Exhibit 24	Parts of page 1, "To" line, "Subject" line,	Meta	because it reveals specific, non-
9	(Dkt. No. 218-1)	"Attachments" line,		public information about Meta's proprietary data storage systems
10		messages 1-13, 15; page 2, messages 1-4, 6-13, 15-22;		(including the names of specific Hive tables and fields, how the
11		page 3, messages 1-2, 5-20; page 4, messages 1-6, 8-9,		systems are organized, and how
12		11, 13-20; page 5, messages		Meta uses the data it receives
13		1-11.		and stores), business analyses and steps taken in connection
1.4		(highlighted in Dkt. No.		with those analyses, and
14		223-1)		employee contact
15				information. If this information
16				were disclosed, it would
10				competitively harm Meta and allow bad actors to undermine
17				the integrity of Meta's
18				systems. Further, if the
10				employee contact information
19				were publicly disclosed, Meta's
20				employees may be inundated with harmful or irrelevant emails
20				from outside Meta, which would
21				disrupt Meta's operations, and
22				Meta would face competitive
				harm.
23	Exhibit 25	Parts of page 1, "From"	Meta	This text should be redacted
24	(Dkt. No. 218-1)	line, "To" line, "Subject"		because it reveals specific, non- public information about Meta's
	(line, messages 2-6, 8-12,		proprietary finance-related
25		14-15; page 2, messages 3-4, 7, 9-11.		integrity systems, business
26				analyses and steps taken in
27		(highlighted in Dkt. No. 223-1)		connection with those analyses,
27		223-1)		and employee contact information. If this information
28				were disclosed, it would

1					competitively harm Meta and
2					allow bad actors to undermine
_					the integrity of Meta's systems. Further, if the
3					employee contact information
4					were publicly disclosed, Meta's
5					employees may be inundated
5					with harmful or irrelevant emails from outside Meta, which would
6					disrupt Meta's operations, and
7					Meta would face competitive
-	_				harm.
8		Exhibit 26	Sealed in full.	Meta	This exhibit should be sealed in full because it reveals specific,
9		(Dkt. No. 218-1)			non-public information about
10		,			Meta's proprietary data storage
10					systems, including the names of
11					specific fields and how they are used. If this information were
12					disclosed, it would competitively
					harm Meta and allow bad actors
13					to undermine the integrity of
14					Meta's systems.
15		Exhibit 27	Parts of page 3, paragraphs	Meta	This text should be redacted because it reveals specific, non-
13		(Dkt. No. 218-1)	1-5, 7-15; page 4,		public information about Meta's
16			paragraphs 3-7, 9-13; page 5, paragraphs 3, 5; page 6,		proprietary data storage systems,
17			paragraph 1.		including the names of specific
			(highlighted in Dkt. No.		Hive tables and fields and how
18			223-1)		the systems can be queried. If this information were disclosed,
19			,		it would competitively harm
20					Meta and allow bad actors to
20					undermine the integrity of
21	-				Meta's systems. This text should be redacted
22		Exhibit 27, exhibit 2	Parts of page 1, paragraphs	Meta	because it reveals specific, non-
			5-27; page 2, paragraphs 1-27; page 3, paragraphs 1-		public information about Meta's
23		(Dkt. No. 218-1)	22.		proprietary data storage systems,
24			(highlighted in Dkt. No.		including the names of specific Hive tables. If this information
25			223-1)		were disclosed, it would
25					competitively harm Meta and
26					allow bad actors to undermine
27					the integrity of Meta's systems. This text should be redacted
		Exhibit 28	Parts of page 8, paragraphs	Meta	because it reveals specific, non-
28			1-2, 4, 6; page 9,		public information about Meta's

-9-

1	(Dkt.	No. 218-1)	paragraphs 1-2; page 12,		proprietary data storage systems,
2			paragraph 4; page 13, paragraphs 5, 8; page 14,		including the names of specific Hive tables and fields, how the
3			heading D, paragraph 4;		systems can be queried, and how
4			page 15, paragraphs 1-3, chart, paragraphs 4-6; page		the systems are organized. If this information were disclosed,
5			16, paragraphs 1, 4; page		it would competitively harm
			18, paragraphs 8, 16-17.		Meta and allow bad actors to undermine the integrity of
6			(highlighted in Dkt. No. 223-1)		Meta's systems.
7	Е	1.11.14.20	Sealed in full.	Maka	This exhibit should be sealed in
8		thibit 28, xhibit E	Sealed in Iuli.	Meta	full because it is an internal
9	(Dkt.	No. 218-1)			technical document, which reveals specific non-public
10					information about Meta's proprietary data storage systems
11					(including the names of specific Hive tables and how data flows
12					through the storage systems) and
13					Pixel capabilities. If this information were disclosed, it
14					would competitively harm Meta
					and allow bad actors to undermine the integrity of
15					Meta's systems.
16	Ex	hibit 28,	Sealed in full.	Meta	This exhibit should be sealed in full because it contains
17		xhibit F			discussion of event data—
18	(Dkt.	No. 218-1)			including specific field names
19					and descriptions of those fields—which is proprietary,
20					commercially sensitive, and confidential. Public disclosure
					of that information—including
21					the specific way that Meta processes, organizes, and stores
22					event data—would place Meta at
23					a competitive disadvantage and could allow bad actors to
24					undermine the integrity of Meta's systems.
25	Ex	khibit 26	Sealed in full.	Meta	This exhibit should be sealed in
26		No. 218-1)	Started III 1011.	1,10,11	full because it reveals specific, non-public information about
27		- /			Meta's proprietary data storage
28					systems, including the names of specific fields and how they are

1				used. If this information were
2				disclosed, it would competitively
2				harm Meta and allow bad actors to undermine the integrity of
3				Meta's systems.
4	Exhibit 28,	Parts of page 3, line 22;	Meta	This text should be redacted
5	exhibit I	page 4, lines 17, 20-21;	111000	because it reveals specific non-
	(Dkt. No. 218-	page 171, lines 2-3, 7-15.		public information about Meta's data storage systems (including
6		(highlighted in Dkt. No.		the names of specific Hive tables
7		223-1)		and how the systems are
8				organized), finance-related
0				integrity systems, and Core Setup setting. If this information
9				were disclosed, it would
10				competitively harm Meta and
				allow bad actors to undermine
11	F. 1.11: 20	0 1 1: 0 11	26.	the integrity of Meta's systems. This exhibit should be sealed in
12	Exhibit 28, exhibit O	Sealed in full.	Meta	full because it contains
13		1)		discussion of event data—
	(Dkt. No. 218-	-1)		including specific field names and descriptions of those
14				fields—which is proprietary,
15				commercially sensitive, and
16				confidential. Public disclosure of
10				that information—including the specific way that Meta
17				processes, organizes, and stores
18				event data—would place Meta at
				a competitive disadvantage and
19				could allow bad actors to undermine the integrity of
20				Meta's systems.
21	Exhibit 28,	Sealed in full.	Meta	This exhibit should be sealed in
	exhibit P			full because it reveals specific, non-public information about
22	(Dkt. No. 218-	-1)		Meta's proprietary data storage
23				systems, including the names of
24				specific Hive tables and fields
				and how Meta uses the data it receives and stores. If this
25				information were disclosed, it
26				would competitively harm Meta
27				and allow bad actors to
<i>Δ1</i>				undermine the integrity of Meta's systems.
28		<u>_</u>		

1 2	Exhibit Q to Exhibit 28	Sealed in full.	Meta	This exhibit should be sealed in full because it is an internal technical document, which
3	(Dkt. No. 218-1)			reveals confidential business
4				analyses and steps taken in connection with those analyses
5				concerning Meta's proprietary data storage systems (including
6				the names of specific tables and fields). If this information were
7				disclosed, it would competitively
8				harm Meta and allow bad actors to undermine the integrity of
9				Meta's systems.
10				
11				
12	Dated:			
13		_	D. C. D.''	
14			P. Casey Pitts United States Dis	strict Court Judge
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				